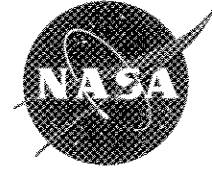


National Aeronautics and Space Administration  
**Headquarters**  
Washington, DC 20546-0001



August 13, 2010

Reply to Attn of:

General Law Practice Group

TO: Distribution

FROM: Alternate Designated Agency Ethics Official

SUBJECT: Determination Regarding Attendance by NASA Employees at the 25<sup>th</sup>  
Anniversary of the First Comet Encounter on September 10, 2010

On September 10, 2010, sponsor, Kinetx, Inc., will host a reception at the Newsuem, in Washington, D.C. from 9:00 a.m.-1:00 p.m. The reception is to celebrate the 25<sup>th</sup> Anniversary of the First Comet Encounter.

This event will be a widely-attended gathering of approximately 140 representatives of NASA, the aerospace industry, the legislative branch, state and local governments, trade associations, academia, and the media. The cost of the reception, which includes food and beverages is approximately \$25.00 per person.

I find that the event meets the requirements of a "widely attended gathering" as defined in 5 C. F. R. § 2635.204(g). I further find that there is an Agency interest in having NASA employees attend this event. Moreover, NASA employees who are in non-career positions in which Executive Order 13490 requires signing an ethics pledge may accept an invitation for free attendance to the event.

However, NASA employees whose duties may substantially affect the Kinetx, Inc., such as by the way of procurement duties, should seek an individual determination pursuant to 5 C.F.R. § 2635.204(g)(3)(i) regarding participation in this event from their local ethics counselor.

A handwritten signature in black ink, appearing to read "Adam F. Greenstone".

Adam F. Greenstone